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Attorneys for Plaintiff, the Collective,
and putative Class, and Aggrieved Employees on
behalf of the State of California

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PAUL MONPLAISIR, on behalf of himself
and all others similarly situated,

Plaintiffs,

vs.

INTEGRATED TECH GROUP, LLC and
ITG COMMUNICATIONS LLC,

Defendants.

Case No. 3:19-cv-01484-WHA

**NOTICE OF FILING OF CONSENTS TO
JOIN COLLECTIVE ACTION**

Judge: Hon. William Alsup

Complaint Filed: March 21, 2019

Trial Date: October 19, 2020

NOTICE OF FILING CONSENTS TO JOIN COLLECTIVE ACTION

Plaintiff Paul Monplaisir, individually and on behalf of all persons similarly situated, hereby files the following Opt-In Consent Forms, submitted herewith as Exhibits 1 through 7, pursuant to the Fair Labor Standards, Act, 29 U.S.C. §§ 201, *et seq.*

CONSENTS TO JOIN COLLECTIVE ACTION

EXHIBIT NUMBER	NAME	OPT-IN NUMBER
1	Seaborn Shepherd	323
2	Seth Harper	324
3	Gennedi LaFrance	325
4	Marco A. Araica	326
5	Michelet Dieujuste	327
6	Josue Louissin	328
7	Edwin Justiniano	329

Date: December 26, 2019

Respectfully submitted,

/s/ Ori Edelstein

Carolyn H. Cottrell

Ori Edelstein

Michelle S. Lim

SCHNEIDER WALLACE

COTTRELL KONECKY

WOTKYNS LLP

Sarah R. Schalman-Bergen (admitted *pro hac vice*)

Krysten L. Connor (admitted *pro hac vice*)

BERGER & MONTAGUE, P.C.

Attorneys for Plaintiff, the Collective,
and putative Class, and Aggrieved Employees on behalf
of the State of California

CERTIFICATE OF SERVICE

I hereby certify that on December 26, 2019, I electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

Date: December 26, 2019

Respectfully submitted,

/s/ Ori Edelstein

Carolyn H. Cottrell

Ori Edelstein

Michelle S. Lim

SCHNEIDER WALLACE

COTTRELL KONECKY

WOTKYNS LLP

Sarah R. Schalman-Bergen (admitted *pro hac vice*)

Krysten L. Connor (admitted *pro hac vice*)

BERGER & MONTAGUE, P.C.

Attorneys for Plaintiff, the Collective,
and putative Class, and Aggrieved Employees on behalf
of the State of California

EXHIBIT 1

DEC 24 2019

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

Name:

Seaborn Shepherd (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Fort Myers, Florida from on or about (start date) March 2018 to on or about (end date) August 2018
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

10-15-2019

(Date Signed)



(Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 2

DEC 24 2019

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

Name:

Seth Harper (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Jacksonville, FL from on or about (start date) 10/18 to on or about (end date) 12/18.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

10/16/19

(Date Signed)



(Signature)

****IMPORTANT NOTE****

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EXHIBIT 3

DEC 24 2019

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC

Case No. 3:19-cv-01484-WHA

United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

Name:

Gennadi La France (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Mia, FL from on or about (start date) June/17 to on or about (end date) June/18.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

12-18-19

(Date Signed)

Gennadi La France (Signature)

****IMPORTANT NOTE****

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EXHIBIT 4

DEC 24 2019

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

Name:

Marco A. Araica (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Miami, Florida from on or about (start date) 06/05/2017 to on or about (end date) 11/22/2017.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

11/10/2019 (Date Signed)

[Signature] (Signature)

****IMPORTANT NOTE****

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EXHIBIT 5

OPT-IN CONSENT FORM

DEC 24 2019

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

Name:

Michelet Dieuguste (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) West Palm beach FL from on or about (start date) 2017 to on or about (end date) 2019. West Palm beach Florida
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

12-18-2019 (Date Signed)

[Signature] (Signature)

****IMPORTANT NOTE****

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EXHIBIT 6

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC

Case No. 3:19-cv-01484-WHA

United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

Name: josue

(Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in **(city, state)** Miami, FL from on or about **(start date)** 2016 to on or about **(end date)** 2018.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

Electronically signed on 12/24/2019 at 0:48 (Date Signed)

josue louissin (Signature)

****IMPORTANT NOTE****

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EXHIBIT 7

OPT-IN CONSENT FORM

Paul Monplaisir v. Integrated Tech Group, LLC (ITG)
United States District Court, Northern District of California

Complete And Submit To:

Carolyn Hunt Cottrell, Esq.
 SCHNEIDER WALLACE
 COTTRELL KONECKY
 WOTKYNs LLP
 2000 Powell Street, Suite 1400
 Emeryville, California 94608

OR

Sarah R. Schalman-Bergen
 BERGER & MONTAGUE, P.C.
 1818 Market Street, 36th Floor
 Philadelphia, Pennsylvania 19103

Name:
 Edwin Justiniano
 _____ (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

- I consent and agree to pursue my claims relating to and arising from Defendant Integrated Tech Group (ITG) alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
- I have worked for ITG as a Technician from approximately (month, year) October 2018 to approximately (month, year) November 2019.
 I worked in **(list the cities and states of branches worked and include cities and states worked as a Traveling Technician)** Tech level 4 commercial.
- I understand that this litigation has been filed as a proposed collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
- I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky Wotkyns and Berger & Montague to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

12/24/2019

 (Date Signed)

DocuSigned by:



B0A800B67E0743E...

 (Signature)

****IMPORTANT NOTE****

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